

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UNITED STATES OF AMERICA,

vs.

GILBERTO RAMOS

Defendant,

Case No.: 12-224 (GBL)

**CERTIFICATION OF COUNSEL IN
SUPPORT OF MOTION TO ADJOURN
TRIAL DATE AND RESET FOR
FEBRUARY 4, 2013**

I, Alan Dexter Bowman, of full age, do hereby certify as follows:

1. I am lead counsel and co-counsel to Robert Jenkins in the above-captioned matter. Trial is presently fixed for January 22, 2013. This certification is submitted in support of a motion to postpone trial two weeks to February 4, 2013. This request is necessitated due to the likelihood that a homicide trial which I am commencing on January 7, 2013 will endure three weeks. The length of trial in the homicide case is impacted by the difficulty associated with selecting a jury in Morris County, New Jersey in early January. The expectation is that the process will be lengthy.
2. The ability to affix a firm trial date in the homicide matter was influenced by the recent storm in New Jersey which impacted the entire state. Many New Jersey residents have only now received 24-hour access to their homes. The County in which the trial is to be conducted was particularly severely affected by the storm.
3. The State's case in the matter at issue in New Jersey, State v. Jade Ransome, is anticipated to only take a week to present. I do not expect to call any witnesses. However, the jury selection process will protract because many people will be unable to sit because of enduring disruptions caused by the storm, and other reasons.
4. Since the last request for a continuance was filed, I have met with defendant Ramos on multiple occasions and we are ready to proceed in terms of completed preparation. The only outstanding task is receipt and review of Jencks material, when it is provided.
5. I believe that it is prudent to timely make this application to make certain that this Court and the United States do not experience any avoidable inconvenience. In this context, comprehending the seriousness of this case and possible consequences, we have prepared diligently in order honestly represent to the Court that this request is not predicated on dilatoriness. Our readiness to proceed is consistent with time previously graciously allotted by the Court and the

magnitude of the undertaking.

6. I explained my circumstances to the New Jersey judge, the Honorable Stuart Minkowitz, J.S. C., who was scheduled to try the matter prior to his being elevated to Presiding judge. With Your Honor's permission, Judge Minkowitz will contact Your Honor's chambers to further elucidate the situation. Please advise as to whether such contact should be effected.
7. The facts herein are true

A handwritten signature in dark ink, consisting of a large, stylized loop followed by a horizontal line extending to the right.

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Dated: December 21, 2012